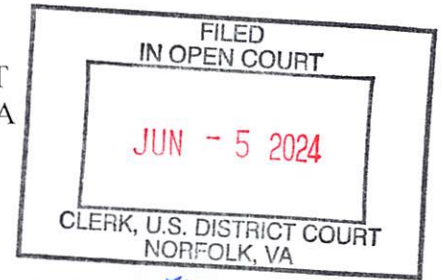


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*



UNITED STATES OF AMERICA )

v. )

BRIAN MANLEY,  
(Count 1) )

and )

LACOLE MANLEY  
(Count 2) )

Defendants )  
)  
)

CRIMINAL NO. 2:24cr 516

18 U.S.C. 1956(a)(1)(B)(i)  
Money Laundering  
(Counts 1-2)

18 U.S.C. § 982(a)(1)  
Forfeiture

INDICTMENT

June 2024 Term – at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all relevant times:

1. Manley Enterprises, Inc. was incorporated with the Commonwealth of Virginia.

Defendant BRIAN MANLEY was Director of Manley Enterprises Inc.

2. On or about May 25, 2020, Manley Enterprises, Inc. fraudulently applied for a Paycheck Protection Program loan.

3. As a result of this application, on or about May 27, 2020, Cross River Bank wired approximately \$350,000 to BRIAN MANLEY's bank account.

4. Lashed by Lynn, Inc. was incorporated with the Commonwealth of Virginia.  
Defendant LACOLE MANLEY was Director of Lashed by Lynn, Inc.

5. On or about June 4, 2020, Lashed by Lynn, Inc. fraudulently applied for a Paycheck Protection Program loan.

6. As a result of this application, on or about June 5, 2020, Celtic Bank wired approximately \$350,000 to LACOLE MANLEY's bank account.

COUNT ONE  
(Money Laundering)

7. The General Allegations of this Indictment are realleged and incorporated as if fully set forth herein.

8. On or about May 27, 2020, in the Eastern District of Virginia and elsewhere, defendant BRIAN MANLEY did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a transfer of \$350,000 from a bank account ending in -1619 to a bank account ending in -0621, which involved the proceeds of a specified unlawful activity, that is, Wire Fraud and Bank Fraud, knowing (i) that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity and (ii) that the property involved in the financial transaction represented the proceeds of some form of said unlawful activity.

(In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.)

COUNT TWO  
(Money Laundering)

9. The General Allegations of this Indictment are realleged and incorporated as if fully set forth herein.

10. On or about June 12, 2020, in the Eastern District of Virginia and elsewhere, defendant LACOLE MANLEY did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a transfer of \$200,000 from a bank account ending in -1892 to another account ending in -1783, which involved the proceeds of a

specified unlawful activity, that is, Wire Fraud and Bank Fraud, knowing (i) that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity and (ii) that the property involved in the financial transaction represented the proceeds of some form of said unlawful activity.

(In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and 2.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of either of the violations alleged in this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, involved in the violation, or any property traceable to that property.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

3. The assets subject to forfeiture include, but are not limited to:

- i. a Land Rover Range Rover “Velar” (bearing vehicle identification number SALYK2EX6LA239039)

(In accordance with Title 18, United States Code, Section 982(a)(1).)

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office

*United States v. Brian Manley and Lacle Manley, Criminal No. 2:24cr 56*

A TRUE BILL:

**REDACTED COPY**

\_\_\_\_\_  
FOREPERSON

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